

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X

MERAB SHENGELIA,

Plaintiff,

-against-

NISSAN-INFINITI LT, NISSAN MOTOR
ACCEPTANCE CORPORTATION, IRENE
GOLD and VLADIMIR GOLD,

Defendants.

-----X

To the above-named Defendants:

Index No.:

Date Purchased:

SUMMONS

Plaintiff designated KINGS County
as place of trial.

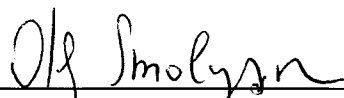
Basis of Venue:

The County in which a substantial
part of the events or omissions
giving rise to the claim occurred.

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance, on the Plaintiff's Attorneys within twenty (20) days of service (or within thirty (30) days after the service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: Brooklyn, New York
January 26, 2022

Yours, etc.,



BY: Oleg Smolyar, Esq.
BOGORAZ LAW GROUP, P.C
Attorneys for Plaintiff
3820 Nostrand Avenue, Suite 106
Brooklyn, N.Y. 11235
File No.: 20-3482

TO: NISSAN-INFINITI LT
PO Box 254648
Sacramento, CA 95865

NISSAN MOTOR ACCEPTANCE
CORPORATION
90 State Street
Albany, NY 12207

IRENE GOLD
144 Wilder Street
Hillside, NJ 07205

VLADIMIR GOLD
144 Wilder Street
Hillside, NJ 07205

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.:

-----X
MERAB SHENGELIA,

Plaintiff,

-against-

COMPLAINT

NISSAN-INFINITI LT, NISSAN MOTOR
ACCEPTANCE CORPORTATION, IRENE
GOLD and VLADIMIR GOLD,

Defendants.
-----X

Plaintiff, MERAB SHENGELIA, by his attorneys, BOGOROAZ LAW GROUP, P.C.,
complaining of the Defendants herein named, respectfully complains to this Court and
alleges the following:

1. At all times hereinafter mentioned, the Plaintiff, MERAB SHENGELIA, was and still is a resident of Kings County, in the City and State of New York.
2. At all times hereinafter mentioned, the Defendant, NISSAN-INFINITI LT, was and still is a foreign corporation, duly organized as a Statutory Trust and existing by virtue of the laws of the State of Delaware and which held titles to motor vehicles being routinely operated within the States of New Jersey and New York.
3. At all times hereinafter mentioned, the Defendant, NISSAN MOTOR ACCEPTANCE CORPORTATION was and still is a foreign corporation, duly organized and existing under the laws of the State of California and operates its business in New Jersey and New York State.
4. At all times hereinafter mentioned, the Defendant, IRENE GOLD, was and still is resident of Union County in the State of New Jersey.

5. At all times hereinafter mentioned, the Defendant, VLADIMIR GOLD, was and still is a resident of Union County, in the State of New Jersey.

6. That on or about June 3, 2020, the Defendant, NISSAN-INFINITI LT, was the registered owner to a 2019 Nissan motor vehicle bearing Vehicle Identification Number (hereinafter VIN) KNMAT2MV5KP515891.

7. That on or about June 3, 2020, the Defendant, NISSAN-INIFINITI LT, held title to the abovementioned 2019 Nissan motor vehicle bearing VIN KNMAT2MV5KP515891.

8. That on or about June 3, 2020, the Defendant, NISSAN MOTOR ACCEPTANCE CORPORATION was the registered owner to the aforesaid 2019 Nissan motor vehicle bearing VIN KNMAT2MV5KP515891.

9. That on or about June 3, 2020, the Defendant, NISSAN MOTOR ACCEPTANCE CORPORATION leased the aforesaid 2019 Nissan motor vehicle bearing VIN KNMAT2MV5KP515891 to the Defendants, IRENE GOLD and VLADIMIR GOLD.

10. That on or about June 3, 2020, the Defendant, NISSAN-INIFIITI LT leased the aforesaid 2019 Nissan motor vehicle bearing VIN KNMAT2MV5KP515891 to the Defendants, IRENE GOLD and VLADIMIR GOLD.

11. That on or about June 3, 2002, the Defendant, VLADIMIR GOLD, was the registered owner to the aforesaid 2019 Nissan motor vehicle bearing VIN KNMAT2MV5KP51589 and bearing New Jersey State license plate number X92LKL.

12. That on or about June 3, 2020, the Defendant, NISSAN MOTOR ACCEPTANCE CORPORATION, managed, maintained and controlled the use and operation of the aforesaid 2019 Nissan motor vehicle bearing New Jersey State license plate number X92LKL.

13. That on or about June 3, 2020, the Defendant, NISSAN-INFINITI LC, managed,

maintained and controlled the use and operation of the aforesaid 2019 Nissan motor vehicle bearing New Jersey State license plate number X92LKL.

14. That on or about June 3, 2020, the Defendants, IRENE GOLD and VLADIMIR GOLD, managed, maintained and controlled the use and operation of the aforesaid 2019 Nissan motor vehicle bearing New Jersey State license plate number X92LKL.

15. That on or about June 3, 2020, the Defendant, IRENE GOLD, operated the aforesaid 2019 Nissan motor vehicle bearing New Jersey State license plate number X92LKL with the permission and consent of the vehicle's owner.

16. That on or about June 3, 2020, the Plaintiff, MERAB SHENGELIA, operated a 2006 Toyota motor vehicle bearing New York State license plate number GCN1916 with the permission and consent of the owner, ARCHIL IVECHIANI.

17. That on or about June 3, 2020, and at all times herein mentioned, the streets and roads in the area of 2650 Ocean Parkway Service Road, in Kings County, in the City and State of New York were and still are public roads, highways and thoroughfares available for public use and public travel.

18. On or about June 3, 2020, at approximately 12:30 P.M., the aforesaid 2019 Nissan motor vehicle bearing New Jersey State license plate number X92LKL operated by the Defendant, IRENE GOLD, collided into the 2006 Toyota motor vehicle bearing New York State license plate number GCN1916, operated by the Plaintiff MERAB SHENGELIA, in the area of 2650 Ocean Parkway Service Road, in Kings County, in the City and State of New York.

19. That the motor vehicle accident was due solely and wholly to the negligence,

carelessness and/or recklessness of the Defendants in their ownership, operation, maintenance, management, leasing and/or control of the said motor vehicle, all without any fault, nor negligence, nor assumption of risk, nor lack of care, nor any other culpable conduct on this Plaintiff contributing thereto.

20. That the Defendants, NISSAN-INFINITI LT and NISSAN MOTOR ACCEPTANCE CORPORATION were negligent in maintaining and/or repairing its aforesaid motor vehicle.

21. That solely as a result of the foregoing collision dated June 3, 2020, the Plaintiff MERAB SHENGELIA sustained severe and serious personal injuries and has been caused to suffer severe physical pain and mental anguish as a result thereof. Upon information and belief, some of these injuries are permanent and lasting in their nature. Plaintiff has been rendered sick, sore, lame, and disabled.

22. That Plaintiff, MERAB SHENGELIA, has sustained serious injuries as defined by § 5102(d) of the Insurance Law of the State of New York and has suffered loss greater than basic economic loss as defined by § 5104 of the Insurance Law of the State of New York.

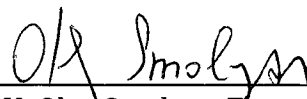
23. This legal action falls within one or more of the exceptions as set forth in C.P.L.R. § 1602 and the Defendants are potentially liable for the full amount of any Judgment or award herein made.

24. By reason of the foregoing, the Plaintiff has been damaged in the sum as encompassed by Statute and by Law as set forth in C.P.L.R. § 3017, plus costs and disbursements of this matter with the provision that the amount of damages sought herein exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction herein.

WHEREFORE, the Plaintiff, MERAB SHENGELIA, demands judgment against the Defendants NISSAN-INFINITI LT, NISSAN MOTOR ACCEPTANCE CORPORATION, IRENE GOLD and VLADIMIR GOLD in the sum allowed under C.P.L.R. § 3017 together with interest, costs, and disbursements of this action.

Dated: Brooklyn, New York
January 26, 2022

Yours, etc.,



BY: Oleg Smolyar, Esq.
BOGORAZ LAW GROUP, P.C
Attorneys for Plaintiff
3820 Nostrand Avenue, Suite 106
Brooklyn, N.Y. 11235
File No.: 20-3482

TO: NISSAN-INFINITI LT
PO Box 254648
Sacramento, CA 95865

NISSAN MOTOR ACCEPTANCE
CORPORATION
90 State Street
Albany, NY 12207

IRENE GOLD
144 Wilder Street
Hillside, NJ 07205

VLADIMIR GOLD
144 Wilder Street
Hillside, NJ 07205

VERIFICATION

STATE OF NEW YORK)
) SS.:
COUNTY OF KINGS)

Merab Shengelia, being duly sworn, deposes and says:

I am the Plaintiff in the within action.

I have read the foregoing SUMMONS and COMPLAINT and know the contents thereof: the same is true to my knowledge, except as to those matters alleged on information and belief, and as to those matters. I believe them to be true to the best of my knowledge.

SP.

Sworn to before me this
26th day of January, 2022

Atiqa Rehman Bhatti
NOTARY PUBLIC
ATIQA REHMAN BHATTI
Notary Public - State of New York
No. 01BH6420012
Qualified in Nassau County
My Commission Expires 07/26/2025

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

Index No.:

MERAB SHENGELIA,

Plaintiff,

- against -

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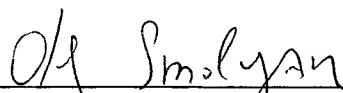
Defendants.

SUMMONS & VERIFIED COMPLAINT

BOGORAZ LAW GROUP, P.C.
Attorneys for Plaintiff
Office and Post Office Address, Telephone
3820 Nostrand Avenue
Suite 106
Brooklyn, N.Y. 11235
(646) 809-1616

Service of a copy of the within is hereby admitted.

Dated: Brooklyn, New York
January 26, 2022


Attorney(s) for Plaintiff

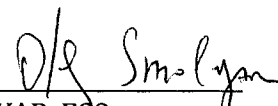
Sir: - Please take notice

that the within is a true copy of a
court on
, 20__

duly entered in the office of the clerk of the within named

Dated: Brooklyn, New York
January 26, 2022

Yours, etc.


BY: OLEG SMOLYAR, ESQ.
BOGORAZ LAW GROUP, P.C.
Attorneys for the Plaintiff
3820 Nostrand Avenue, Suite 106
Brooklyn, New York 11235
File No.: 20-3482